

## Joel Torres Ortiz

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**From:** TCA PR <tca.prm@gmail.com>  
**Sent:** Friday, August 04, 2017 12:25 PM  
**To:** Joel Torres Ortiz  
**Cc:** Saucedo, Luis E (CRT); Marcos Soler; Clementina Vega Rosario (CVega@policia.pr.gov); Yashira M Vega Montalvo (YMVega@policia.pr.gov); Lorena Garcia Rios (LGarcia@dsp.pr.gov); Wandymar Burgos Vargas; Susana Peñagaricano; Iván J. Ramírez Camacho; Antonio Bazan; Alfredo Castellanos; Federico Denton; Mygatt, Timothy (CRT); Buehler, Brian (CRT); Garcia, Lynda (CRT); Wayne, Seth (CRT); Lopez, Sarah (CRT); Rivera, Jennifer (CRT)  
**Subject:** Re: Informe Semestral de la PPR

Thank you Joel. We truly respect the decision of the Commonwealth. The TCA office is in the process of putting together the next agenda (14-18 August) which we will share as soon as we meet and discuss with Col Vega. Have a great weekend. Arnaldo Claudio, TCA

On Fri, Aug 4, 2017 at 10:36 AM, Joel Torres Ortiz <[joeltorres@justicia.pr.gov](mailto:joeltorres@justicia.pr.gov)> wrote:

Mr. Claudio,

I recommend that you discuss with your constitutional lawyers the courts order at docket 591.

Please inform to the parties if the TCA is refusing to send at this moment the latest revisions of the Draft Report. The purpose of this request is to asses if indeed the issue presented at court is moot. The parties cannot brief the court in this matter if we do not have the information that we are requesting. Therefore, if the TCA refuses to share the latest revision of the report, the Commonwealth will proceed to seek relief through the court.

Joel Torres Ortiz, Esq.

Federal Litigation Division

Office of Civil Litigation

Puerto Rico Department of Justice

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**From:** TCA PR [mailto:[tca.prm@gmail.com](mailto:tca.prm@gmail.com)]

**Sent:** Friday, August 04, 2017 10:06 AM

**To:** Joel Torres Ortiz

**Cc:** Saucedo, Luis E (CRT); Marcos Soler; Clementina Vega Rosario ([CVega@policia.pr.gov](mailto:CVega@policia.pr.gov)); Yashira M Vega Montalvo ([YMVega@policia.pr.gov](mailto:YMVega@policia.pr.gov)); Lorena Garcia Rios ([LGarcia@dsp.pr.gov](mailto:LGarcia@dsp.pr.gov)); Wandymar Burgos Vargas; Susana Peñagaricano; Iván J. Ramírez Camacho; Antonio Bazan; Alfredo Castellanos; Federico Denton; Mygatt, Timothy (CRT); Buehler, Brian (CRT); Garcia, Lynda (CRT); Wayne, Seth (CRT); Lopez, Sarah (CRT); Rivera, Jennifer (CRT)

**Subject:** Re: Informe Semestral de la PPR

Good morning Joel...we appreciate both DOJ and Commonwealth's comments on the 6 months report as per Paragraph 252 and our discussions of your comments on 21 July 2017. We consider both of your responses and made changes to the report; you will see those in my final report. As per paragraph 252 both DOJ and PRPD may file responses to the TCA's final report within 30 days after the TCA files. Thank you

On Fri, Aug 4, 2017 at 9:23 AM, Joel Torres Ortiz <[joeltorres@justicia.pr.gov](mailto:joeltorres@justicia.pr.gov)> wrote:

Good Morning,

The Commonwealth joins the USDOJ's request to send the Parties a redline reflecting changes you intend to make or otherwise indicating language that you intend to redact. Also, please provide what are the "other sources" that you will be using in the draft report to substitute the subject document.

Cordially,

Joel Torres Ortiz, Esq.

Federal Litigation Division

Office of Civil Litigation

Puerto Rico Department of Justice

Tel. 787-721-2900 Ext. 2629.

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**From:** [tca.prm@gmail.com](mailto:tca.prm@gmail.com) [mailto:[tca.prm@gmail.com](mailto:tca.prm@gmail.com)]

**Sent:** Thursday, August 03, 2017 8:02 PM

**To:** Saucedo, Luis E (CRT); Joel Torres Ortiz

**Cc:** Marcos Soler; Clementina Vega Rosario ([CVega@policia.pr.gov](mailto:CVega@policia.pr.gov)); Yashira M Vega Montalvo ([YMVega@policia.pr.gov](mailto:YMVega@policia.pr.gov)); Lorena Garcia Rios ([LGarcia@dsp.pr.gov](mailto:LGarcia@dsp.pr.gov)); Wandymar Burgos Vargas; Susana Peñagaricano; Iván J. Ramírez Camacho; Antonio Bazan; Alfredo Castellanos; Federico Denton; Mygatt, Timothy (CRT); Buehler, Brian (CRT); Garcia, Lynda (CRT); Wayne, Seth (CRT); Lopez, Sarah (CRT); Rivera, Jennifer (CRT)

**Subject:** Re: Informe Semestral de la PPR

As stated...the point in consideration was well explained in my email. Thank you.

*Sent from my T-Mobile 4G LTE device*

----- Original message-----

**From:** Saucedo, Luis E (CRT)

**Date:** Thu, Aug 3, 2017 7:54 PM

**To:** Joel Torres Ortiz;

**Cc:** TCA PR; Marcos Soler; Clementina Vega Rosario ([CVega@policia.pr.gov](mailto:CVega@policia.pr.gov)); Yashira M Vega Montalvo ([YMVega@policia.pr.gov](mailto:YMVega@policia.pr.gov)); Lorena Garcia Rios ([LGarcia@dsp.pr.gov](mailto:LGarcia@dsp.pr.gov)); Wandymar Burgos Vargas; Susana Peñagaricano; Iván J. Ramírez Camacho; Antonio Bazan; Alfredo Castellanos; Federico Denton; Mygatt, Timothy (CRT); Buehler, Brian (CRT); Garcia, Lynda (CRT); Wayne, Seth (CRT); Lopez, Sarah (CRT); Rivera, Jennifer (CRT);

**Subject:** Re: Informe Semestral de la PPR

Arnaldo,

As Joel noted, the Court has issued a briefing schedule on the Commonwealth's motion (Doc. 590). You state that you agreed to make a change to SMR-6 at the 7/21 meeting and that your report is ready to be filed as soon as the court is ready to receive it, suggesting that you believe the issue is moot. We cannot evaluate this assertion, if it's what you mean, without first seeing the specific changes that you intend to make or have made (i.e., specific additions, deletions, modifications, or redactions). Please note that the United States also submitted comments on the same section of the report.

I suggest that you send the Parties a redline reflecting changes you intend to make or otherwise indicating language that you intend to redact. I think we can avoid an academic exercise if your changes are satisfactory to the Parties. It would also conserve public resources if the briefing addressed the most recent version of your report. If your report is ready, as you state, then we all would be working off of the latest draft of the report.

Thank you for your consideration.

Luis

On Aug 3, 2017, at 4:28 PM, Joel Torres Ortiz <[joeltorres@justicia.pr.gov](mailto:joeltorres@justicia.pr.gov)> wrote:

Good evening,

The court has ordered that this matter remain restricted. See order 590. The Commonwealth will present its argument through the memorandum of law that the court requested.

Joel Torres Ortiz

Sent from my iPhone

On Aug 3, 2017, at 6:46 PM, TCA PR <[tca.prm@gmail.com](mailto:tca.prm@gmail.com)> wrote:

Joel, thank you so much I. I was made aware of the motion by the Commonwealth and the subject. If you can recall during our meeting at PRPD Headquarters on July 21, 2017 we discussed the issue the Commonwealth has presented in its motion. On that day; after an exchange of information with Attorney Estrella Vega I told all present that the subject document was not going to be use for my report but rather other sources of information. I presented an example source in the form of an article by El Vocero. My Report is ready and I will submit as soon as the court is ready to be received. My CLs are very aware of the issue and I will always seek their advice as we proceed. I have until 14 August to present my Report. I thank you for your time and effort and again wish you all a great weekend.

On Thu, Aug 3, 2017 at 3:07 PM, Joel Torres Ortiz <[joeltorres@justicia.pr.gov](mailto:joeltorres@justicia.pr.gov)> wrote:

Saludos,

En el día de hoy el Gobierno de Puerto Rico ha presentado una moción relacionada a su informe en el Tribunal. Muy respetuosamente solicitamos que espere que el Tribunal resuelva la moción antes de presentar su informe.

Cordialmente,

Joel Torres Ortiz, Esq.

Federal Litigation Division

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